

IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF OKLAHOMA

W. A. DREW EDMONDSON, in his )  
capacity as ATTORNEY GENERAL )  
OF THE STATE OF OKLAHOMA and )  
OKLAHOMA SECRETARY OF THE )  
ENVIRONMENT C. MILES TOLBERT,) )  
in his capacity as the )  
TRUSTEE FOR NATURAL RESOURCES) )  
FOR THE STATE OF OKLAHOMA, )

Plaintiff, )

vs. )

4:05-CV-00329-TCK-SAJ

TYSON FOODS, INC., et al, )

Defendants. )

THE DEPOSITION OF RANDALL

ALLEN, produced as a witness on behalf of the  
Plaintiff in the above styled and numbered cause,  
taken on the 12th day of March, 2007, in the City of  
West Siloam Springs, County of Delaware, State of  
Oklahoma, before me, Lisa A. Steinmeyer, a Certified  
Shorthand Reporter, duly certified under and by  
virtue of the laws of the State of Oklahoma.

1 A Yes.

2 Q And how many birds does he have a flock in his  
3 house on the average?

4 A Probably about 56,000.

5 Q Per house? 09:14AM

6 A No. The two together.

7 Q So he would have about 28,000 birds per house?

8 A Yes.

9 Q And does he have also five to six flocks a  
10 year? 09:14AM

11 A Yes.

12 Q And the birds that come on your farm -- let's  
13 talk about a single flock for all three houses -- it  
14 would be 60,000 birds roughly?

15 A Uh-huh. 09:15AM

16 Q Is that correct, sir?

17 A Yes, sir.

18 Q Okay, and where do you get those 60,000 birds?

19 A The company that I contract with, Peterson,  
20 delivers them to my houses. 09:15AM

21 Q And Peterson Farms is the company you  
22 mentioned awhile ago that's represented by Mr. Scott  
23 McDaniel?

24 A Yes.

25 Q You ever heard them referred to as an 09:15AM

1 A Yes.

2 Q Could we make a list here, not write it, but  
3 could you just tell me what organizations, poultry  
4 first, that you belong to, sir, right now today I  
5 mean?

10:03AM

6 A Yes. Poultry Partners.

7 Q How long have you belonged to Poultry  
8 Partners?

9 A Probably around two years.

10 Q Would you say you've belonged to it since it  
11 was formed?

10:03AM

12 A Yes.

13 Q What else; Poultry Partners?

14 A I don't know if I understand what kind of  
15 organizations you're asking.

10:03AM

16 Q Well, I was really thinking about grower-type  
17 or poultry-type organizations first, not something  
18 like the Masons or the Mount Hermon Church.

19 A That's the only poultry organization that I  
20 can think of right now that I'm a member of.

10:04AM

21 Q What about Poultry Community Council; is that  
22 one you're a member of?

23 A Not that I'm aware of.

24 Q Have you ever -- do you even know whether such  
25 a thing exists, Poultry Community Council?

10:04AM